

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**JOINT MOTION TO STAY AND NOTICE OF SETTLEMENT**

Plaintiff Panther Creek Medical Center, P.A. (“Plaintiff”) and Defendants Village Practice Management Company LLC, Village Practice Management Company of Houston LLC, and VillageMD of Southeast Texas, PA d/b/a Village Medical (collectively “Defendants”) file this Joint Motion to Stay All Deadlines and Notice of Settlement. Plaintiff and Defendants have reached a settlement in principle in the matter, and expect to finalize the agreement within the stay requested.

In furtherance of the impending settlement agreement, the parties move the Court to stay all deadlines and events in the matter for thirty (30) days.

WHEREFORE, the parties respectfully request that the Court grant this joint motion and stay all applicable deadlines and events for thirty (30) days.

Date: October 1, 2020

Respectfully submitted,

<p><i>/s/ Paul R. Morico</i></p> <p>Paul R. Morico Lead Attorney Texas Bar No. 00792053 BAKER BOTTs L.L.P. One Shell Plaza 910 Louisiana Street Houston, Texas 77002 Tel.: (713) 229-1732 Fax: (713) 229-7732 Paul.morico@bakerbotts.com</p> <p>Elizabeth K. Rucki Texas Bar No. 24060651 SDTX Bar No. 113507 BAKER BOTTs L.L.P. 2001 Ross Avenue Suite 900 Dallas, TX 75201-2980 Tel.: (214) 953-6926 Fax: (214) 661-4926 elizabeth.rucki@bakerbotts.com</p> <p>Beverly A. Berneman (Pro Hac Vice) Illinois Bar No. 6189418 Ashley L. Orler (Pro Hac Vice)</p> <p><i>Attorneys for Defendants</i></p>	<p><i>/s/ Califf T. Cooper</i></p> <p>Tammy J. Dunn State Bar No. 24045660 SDTX No. 562006 Dunn@oshaliang.com</p> <p>Califf T. Cooper State Bar No. 24055345 SDTX No. 713685 Cooper@oshaliang.com</p> <p>Keelin A. Hargadon State Bar No. 24087668 SDTX No. 2708053 Hargadon@oshaliang.com</p> <p>OSHA LIANG LLP 909 Fannin Street, Suite 3500 Houston, Texas 77010 Tel.   Fax: 713.228.8600   713.228.8778</p> <p><i>Attorneys for Plaintiff, Panther Creek Medical Center P.A</i></p>
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on counsel of record via the Court's ECF system, on this the 1st day of October, 2020.

/s/ *Califf T. Cooper*